

UNITED STATES DISTRICT COURT  
District of Massachusetts

Civil Action No. 05-10078-DPW  
FILED  
NOV 23 2005  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PETER A. CRAWFORD, Plaintiff

v.

WOLVERINE, PROCTOR & SCHWARTZ, INC.,  
Steven F. Chilinski, Deepak S. Kulkarni,

Defendants

PLAINTIFF'S MOTION TO COMPEL THE DEPOSITION OF DEFENDANT  
KULKARNI AND FOR SANCTIONS AND EXPENSES

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests, pursuant to Local Rule 7.1(d), that oral argument be permitted on this motion.

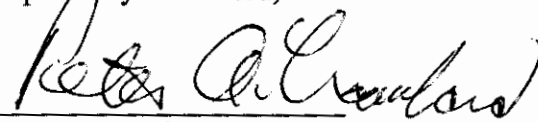
MOTION

Now comes the plaintiff in the above captioned action, and moves that this Honorable Court order defendant Kulkarni, pursuant to Fed. R. Civ. P. Rule 37(d), to attend a deposition within three business days after the allowance of this motion, order defendant Kulkarni and his counsel to reimburse the plaintiff for \$220.97 in expenses associated with defendant Kulkarni's failure to appear for his deposition, and pursuant to Fed. R. Civ. P. Rule 37(b)(2)(C) order judgment by default against defendant Kulkarni, or such other sanction as this Court deems just and meet.

CERTIFICATE OF CONFERRAL

Plaintiff hereby certifies that he has complied with the provisions of Local Rule 37.1, as further detailed in the accompanying memorandum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter A. Crawford", written over a horizontal line.

Peter A. Crawford, pro se  
23 Newcastle Dr. #11  
Nashua, NH 03060  
(603)888-4574

Date: Nov. 22, 2005